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IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF OREGON
PENDLETON DIVISION

GREATER HELLS CANYON COUNCIL,
an Oregon nonprofit corporation,
and **OREGON WILD**, an Oregon nonprofit
corporation,

Plaintiffs,

v.

KRIS STEIN, District Ranger, Eagle Cap
Ranger District, Wallowa-Whitman National
Forest, in her official capacity; and **UNITED
STATES FOREST SERVICE**, an agency of
the United States Department of Agriculture,

Defendants,

and

WALLOWA COUNTY, a political
subdivision of the State of Oregon,

Defendant-Intervenor.

Case Number: 2:17-cv-00843-SU

**DECLARATION OF SEAN
STEVENS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
INJUNCTION PENDING APPEAL**

I, Sean Stevens, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge and if called as a witness, I could and would competently testify thereto under oath. As to those matters which reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.

2. I am the Executive Director for Oregon Wild. In that capacity, I am well aware of the financial holdings and status of the organization.

3. As detailed in our most recent IRS form 990, we had net assets at the end of fiscal year 9/30/2017 of \$1,037,413. Our expenses for fiscal year 2017 were \$1,340,926.

4. Our liquid assets at the end of fiscal year 2017 were approximately \$551,868. Our current operating expenses are approximately \$98,000 per month. Our current liquid assets cover only approximately 6 months of operating expenses.

5. Financial operations of an organization like Oregon Wild are very different from a for-profit corporation because a large portion of our funding comes from foundations through grants which is typically dedicated to a particular activity or expense. In fiscal year 2017, we received \$248,800 in grant monies. This is not discretionary money that is available to spend as we please.

6. Because so much of the money we receive in grants is allocated to a particular activity, we rely on our general funds and donations of individuals to fund our general operating expenses. These general operating expenses cover all administrative functions, including administrative and executive staff salaries, rent, equipment purchase, maintenance and repair, and any other overhead expenses of Oregon Wild. Oregon Wild has allocated all of its general funds to meet the requirements of our current budget and currently has only a small amount-

\$718,000 of funds in reserve, approximately \$550,000 of that in a board designated endowment fund and the remainder in a board designated reserve fund. Right now, even a small bond could require eliminating one or more administrative or staff positions at Oregon Wild.

7. As a small non-profit, there is little room to pay more than a nominal bond. Oregon Wild generally spends much of the money it receives annually.

8. Oregon Wild seeks to advance the public interest in protecting the environmental integrity of public lands, endangered species, and enforcing environmental laws, including the National Environmental Policy Act and the National Forest Management Act. If Oregon Wild had to post a substantial bond each time it sought preliminary injunctive relief, it would effectively preclude judicial relief under our nation's federal environmental laws. Imposing a bond in this lawsuit would have a chilling effect on the ability of Oregon Wild to bring lawsuits to advance public interests and enforce environmental laws.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28 day of September 2018.

s/ Sean Stevens
Sean Stevens